

Exhibit 3

DECLARATION OF SALAH ABDALLA MOHAMED

I, Salah Abdalla Mohamed, declare:

1. I am a citizen of Sudan, residing in Cairo, Egypt.
2. I received an engineering degree from the University of Khartoum in 1982.
3. Prior to joining the Sudanese government in 1990, I was self-employed for eight to nine years.

Roles with Sudanese Government

4. My first role with the Sudanese government was in the Security Bureau in 1990.
5. In 1991, as a Major in the Security Bureau, I was tasked with forming the Unit of Special Missions, which I oversaw until 1995.
6. The mandate of the Unit of Special Missions was to coordinated security protection to certain very important persons (VIPs), such as civilian leaders of political parties, non-military government officials, and major foreign investors.
7. From 1995 – 2000, I was assigned to a military factory that produced military equipment.
8. In 2000, I was appointed Deputy Director of the Internal Security Service.
9. In 2002, I was appointed the Director General of the Internal Security Service.
10. In 2004, I was responsible for integrating the Sudanese government's Internal Security Service and External Security Service into a new intelligence Bureau called the National Intelligence Security Service (NISS). I was the head of the NISS from 2004 until 2009.
11. In 2009, I was appointed the Presidential Advisor for National Security. In 2011, I was removed as part of a personnel reorganization.

A handwritten signature in blue ink, consisting of a long horizontal stroke with a small vertical tick mark near the center and a curved flourish at the end.

12. In 2012, I was accused of conspiring to overthrow former President Omar Al-Bashir and imprisoned for seven months. I was released when the government found these allegations to be false.

13. Between 2012 and 2018 I worked in the private sector, focusing on the regional oil and gas trade.

14. In 2018, I was brought back into the Sudanese government and served as head of the NISS.

15. In 2019, I was part of the Military Council that ousted Omar Al-Bashir from the Presidency.

16. Also in 2019, I retired from government work and moved to Cairo where I have lived since.

Protection for VIPs in Sudan

17. During my time at the Unit of Special Missions, I was responsible for, among other things, overseeing the provision of security details to many important civilian VIPs, including foreign investors who invested in Sudan. I had hundreds of agents reporting to me dedicated to that function.

18. Many of the investors came from prominent families in the Arabian Peninsula and would spend significant periods of time in Sudan.

19. Some of these investors settled in Sudan and integrated and married into the local community, eventually becoming prominent Sudanese families.

20. Among other things, the investors focused on infrastructure, agriculture, and livestock investments. Many formed local partnerships and joint ventures.

21. Unfortunately, in Sudan, there is a history of extremists attacking and attempting to assassinate foreign and Sudanese prominent individuals and public figures.

22. In response to this history, the Sudanese government made efforts to protect such figures, and providing such protection to prominent foreign investors became a longstanding practice in

Sudan. The number of security guards and personnel detailed to any particular investor would depend on the movements and needs of the individual. Some foreign investors might require just a handful of security personnel while others might require as many as 35. The Unit was responsible for the security of 50-60 VIPs at any one time.

Relationship with Osama bin Laden

23. Osama bin Laden was one of the many foreign investors for whom I arranged a security detail.

24. He had a construction business as well as an export-import business in sesame, livestock, and gum Arabic among other commodities.

25. Initially Osama bin Laden invested in Sudan from outside the country, making periodic visits to Sudan from Saudi Arabia. He ultimately relocated to Sudan in around 1992. My recollection is he did not leave Sudan at all until his departure from the country in 1996. I understand that his foreign associates included engineers from his family's companies. Any Arab associates of his would not have needed visas to enter Sudan or most other Arab nations at the time.

26. Like any important foreign investor, the Unit of Special Missions was tasked with protecting Osama bin Laden when he visited and later resided in Sudan.

27. When Osama bin Laden lived in Sudan, I assigned security to both his home and his office, which were located in the same neighborhood, called Al-Riyadh. As one of the wealthiest neighborhoods in Khartoum, prominent politicians and preachers also lived in the neighborhood, and the Unit of Special Missions had many postings there. He also had four farms, one in Eastern Sudan, one in Blue Nile State, and two within Khartoum. I personally visited the two farms in Khartoum and my personnel provided security for all four farms.

28. The Unit of Special Missions also vetted any Sudanese civilian who worked in the bin Laden household, for example as a cook or a cleaner. This was the same treatment any significant foreign investor would have received at that time from the Unit of Special Missions.

29. I interacted with bin Laden in my capacity as the head of the Unit of Special Missions often during his time in Sudan, because I was responsible for his protection. I am aware he had occasional visitors, but no big groups.

30. When I inspected bin Laden's home and office or security personnel from my unit accompanied him out of Khartoum, I had no indication that he had any property being used for a training camp of any kind. I had no indication of the handling of explosives or the use, transport, or purchase of weaponry by Osama bin Laden or at any of his properties.

31. Reports from security personnel stationed at Osama bin Laden's farms did not indicate that any of his farm properties were being used for a training camp of any kind. These farms were not isolated nor remote.

32. In my interactions with Osama bin Laden, I recall discussing his investments and obstacles with the business environment in Sudan, security arrangements, and relations with his family. Such casual conversations were typical of my interactions with other investors I accompanied.

33. In February 1994, an attack was made against Osama Bin Laden in Khartoum. The Unit of Special Missions engaged in a firefight with a group of four militants who attempted to attack bin Laden's home.

34. The militants had started their attack by opening fire on a mosque in Omdurman, killing around seventeen people. The militants then drove across the river to the Al-Riyadh neighborhood in Khartoum, where they entered a mosque to pray. The mosque was located between bin Laden's

home and the home of the former Vice President of Sudan, Ali Osman Taha, another subject of our security protection.

35. When I learned of the location of the militants at the mosque, I directed security agents from bin Laden's home and from the home of Ali Osman Taha to go to the mosque to engage the militants when they exited.

36. When the militants exited the mosque in Al-Riyadh, the security agents engaged them in a firefight that ended at bin Laden's home.

37. Three of the militants were apprehended and arrested; the fourth was injured in the firefight and taken to the hospital where he died.

38. At the time of the attack, Osama bin Laden was in his house under the protection of the Unit's security guards, but he was not injured in the attack.

Osama Bin Laden's departure from Sudan

39. In around 1995, Sudan decided to expel from the country non-Sudanese individuals who were previously in Afghanistan in the 1980s (known as "Afghan-Arabs"). I was involved in the meeting that made this decision. At this time, Sudan also decided to end visa-free entry for nationals from other Arab countries.

40. The decision was motivated by a 1995 assassination attempt against former Egyptian President Hosni Mubarak in Addis Ababa, Ethiopia. The attempt was planned by the Egyptian "Gema'a Islamiya" out of Khartoum. By 2000, my discussions with Egyptian and Ethiopian officials, including the Ethiopian President, corroborated Sudan's understanding that Sudan had nothing to do with the attempt.



41. The Sudanese government itself arrested and deported many Afghan-Arabs after the attempt. This included investors as well as individuals with suspected connections to extremist groups. I recall the total number of people expelled being over one hundred.

42. To my knowledge, President Bashir and Hassan Al-Turabi informed bin Laden of the Sudanese government's decision to expel him from Sudan.


43. To my understanding, the Sudanese government engaged with the Saudi Arabian government through a mediator to accept bin Laden's return, but the Saudi Arabian government refused his reentry.

44. To my knowledge the United States never requested information on Osama bin Laden during his time in Sudan. In the late 1990s, the CIA came to Khartoum to review bin Laden's former properties and activities and toured the locations unannounced.

Counter-Terrorism Cooperation with the United States

45. I traveled once in my life to the United States in around 2005, at the invitation of the CIA. The CIA sent a plane to retrieve me in Khartoum for a meeting in Langley to discuss counter-terrorism cooperation. After the meeting, I returned to Khartoum on a plane provided by the CIA.

46. During my tenure as the head of the NISS, the CIA and the NISS established a joint Sudanese-American counter-terrorism effort called CTOP.



47. CTOP comprised of officers from the NISS and CIA, stationed in Khartoum, with a direct link to the CIA in the United States and myself.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 6, 2025



Salah Abdalla Mohamed